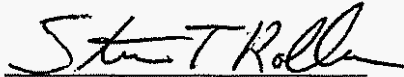


CERTIFICATION

I, Steven T. Koller, hereby certify this 3<sup>rd</sup> day of February, 2006 that I am an officer of Arapahoe Telephone Company and that I have personal knowledge that Arapahoe Telephone Company has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set for in 47 C.F.R. 64.2001-2009.

A handwritten signature in black ink, appearing to read "Steven T. Koller", is written over a horizontal line.

Steven T. Koller

Treasurer, Arapahoe Telephone Company

## STATEMENT

Arapahoe Telephone Company ("Carrier") has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of consumer proprietary network information ("CPNI").

- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI.